

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DILIGENT ENTERPRISE MANAGEMENT, LLC,

Plaintiff,

- against -

AML GLOBAL ECLIPSE, LLC, DWC PINE
INVESTMENTS I, LTD., ALAN KLAPMEIER, JAMES
CARROLL, STEVE SERFLING, RJ SIEGLE, and MIKE
WYSE,

Defendants.

1:24-cv-02228-VEC

**SUPPLEMENTAL
DECLARATION OF
MICHAEL C. KEATS**

I, Michael C. Keats, make this declaration pursuant to 28 U.S.C. § 1746 on behalf of defendant AML Global Eclipse, LLC (“AML Global”), and defendants Alan Klapmeier, James Carroll, Steve Serfling, RJ Siegle, and Mike Wyse (the “Individual Defendants” and, together with AML Global, the “Moving Defendants”) in support of Moving Defendants’ motion for costs and sanctions. I hereby declare as follows:

1. I am a member of the law firm Fried, Frank, Harris, Shriver & Jacobson LLP, a member of the bar of this Court, and counsel of record to AML Global in the above-captioned action. I am submitting this supplemental declaration, and the accompanying reply memorandum of law, together with counsel for the Individual Defendants in support of the instant motion.

2. Attached hereto as **Exhibit B** is a true and correct copy of the “Transcript of Video Status Conference Before the Honorable J. Kate Stickles United States Bankruptcy Judge,” which took place on April 10, 2024 in the bankruptcy proceedings of ONE Aviation Corporation and its affiliates, which are jointly administered under the case caption *In re: ONE Aviation Corporation, et. al.*, Case No. 18-12309-JKS (D. Del. filed Oct. 9, 2018).

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 30, 2024 in New York, New York.

A handwritten signature in black ink, appearing to read "Michael C. Keats", written over a horizontal line.

Michael C. Keats
michael.keats@friedfrank.com